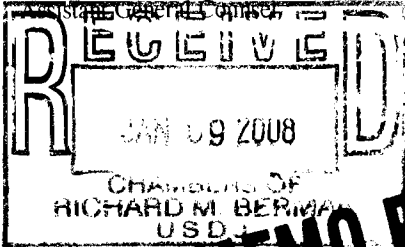




Sheila E. Carson, Esq.
Vice President and



Via Hand Delivery

MEMO ENDORSED

We can discuss @ 2/13/08	
conference @ 9:15 A.M. Def's	
time to answer a move is	
stayed until the conference. No	
submissions are needed before then	
unless PL wishes to respond to this	
letter (optional).	
SO ORDERED:	
Date: 1/10/08	Richard A. Berman
January 9, 2008	Richard M. Berman, U.S.D.J.

Honorable Richard M. Berman
United States District Court
Southern District of New York
40 Centre Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1/10/08

Re: Lizbeth O'Keefe a/k/a Lisbeth O'Keefe v. JPMorgan Chase Bank, N.A.
Docket No. 07 CIV 9811(RMB)

Dear Judge Berman:

I am a member of the JPMorgan Chase Legal Department, which represents JPMorgan Chase Bank, N.A. ("Chase") in connection with the above-referenced lawsuit filed by *pro se* plaintiff, Lizbeth O'Keefe ("Plaintiff").


Chase contemplates making a motion to dismiss the complaint pursuant to Federal Rule of Civil Procedure 12(b) on the grounds that this court lacks subject matter jurisdiction (as well as other grounds).

Your Honor's individual court rules require that a pre-motion conference be held prior to the filing of a motion. Accordingly, I am writing to request the scheduling of a pre-motion conference and for clarification and guidance as to how to proceed. As Chase's time to answer or otherwise move against the complaint otherwise would be January 10, 2008, Chase seeks to confirm that submission of this pre-motion conference scheduling letter prior to January 10, 2008 will stay Chase's time to answer, move or otherwise respond to the complaint, pending the Court's ruling on Chase's request to make a motion under Fed R. Civ. P. 12(b).

O'Keefe
Page Two - Continued

Chase thanks the Court for its prompt attention to this matter.

Very truly yours,



Sheila E. Carson

cc: Lizbeth O'Keefe (Pro Se Plaintiff by Overnight Mail)

SC/vj